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Attorneys for Plaintiffs  
JASON CRAIG and MICHAEL ROSS

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

JASON CRAIG and MICHAEL ROSS  
Individually and on behalf of all similarly  
Situated current and former employees,

Plaintiff,

v.

CORTEVA, INC., E.I. DUPONT DE  
NEMOURS & COMPANY, DOW  
AGROSCIENCES LLC, THE DOW  
CHEMICAL CO., DOWDUPONT, INC.  
n/k/a/ DUPONT DE MEMOURS, INC., DOW  
INC., and DOES 1-10, inclusive

Defendants.

**CASE NO. 3:19-cv-07923-JCS**

**DECLARATION OF JEFFREY D.  
JOHNSON REGARDING THE  
DISTRIBUTION OF SETTLEMENT  
FUNDS**

1 I, Jeffrey D. Johnson, being first duly sworn, hereby depose and state:

2 1. I am the Vice President of CAC Services Group, LLC (“CAC”), located at 6420  
3 Flying Cloud Dr, Suite 101, Eden Prairie, MN. I am over twenty-one (21) years of age, and I am  
4 not a party to the above-captioned action. I have personal knowledge of the facts set forth herein  
5 and, if called as a witness, could and would testify competently thereto.

6 2. The accounting filed on March 31, 2022, included an erroneous reference to a cy  
7 pres recipient, in contrast with the Amendment to the Joint Stipulation at ¶11 which provides that  
8 if any checks remain uncashed, any uncashed checks should be sent to the California State  
9 Controller’s Office Unclaimed Property Fund.

10 3. Checks were mailed to Class Members on March 10, 2022. Pursuant to the  
11 Settlement Agreement the checks were valid and negotiable for 180 days until September 6,  
12 2022. No checks were returned as undeliverable. Eight (8) checks remain uncashed for a total of  
13 \$34,429.33. We will transfer that amount to the California State Controller’s Office Unclaimed  
14 Property Fund for the benefit of the Class Member to whom the payment was designated in  
15 accordance with state law by September 30, 2022.

16 ///

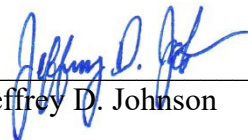
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4. The following chart contains the Post-Distribution Accounting information required for submission per the Settlement Agreement.

Post Distribution Accounting (as of 9/14/2022)		
Total Settlement Fund	\$3,800,000.00	
Total Class Members	223	
Total Class Members Reached	222	
Claim Forms Submitted	N/A	
Opt-Outs	0	0.0%
Objections	0	0.0%
Average Recovery	\$12,467.12	
Median Recovery	\$13,092.37	
Maximum Recovery	\$19,671.78	
Minimum Recovery	\$332.29	
Method of Notice	Notice via First-Class Mail	
Method of Payment	Paper Check via First-Class Mail	
Checks Not Cashed	8	\$34,429.33
Amount to be Sent to the State Controller's Office	Unknown	
Administrative Costs	\$8,166.78	
Attorneys' Fees	\$950,000.00	25.0%
Attorneys' Costs	\$21,664.81	

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16<sup>th</sup> day of September, 2022.

  
 \_\_\_\_\_  
 Jeffrey D. Johnson